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Attorney for Debtor Edward S. Ehee

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

VIPER CAPITAL MANAGEMENT, LLC,  
et al.,

Defendants,

and

COMPASS WEST FUND, et al.,

Relief Defendants.

No. C 06-06966 SI and 06-7270 SI;  
07-02507 SI; 07-02508 SI; 07-02509 SI

(Formerly: U.S. Bk. Ct. N.D. Cal. Involuntary  
Chapter 7 Case Nos. 07-40126T, 07-40129T,  
07-40130T)

**EDWARD EHEE'S MOTION FOR ORDER  
AUTHORIZING SALE OF PROPERTY**

**[No Hearing Scheduled]**

(Local Bankruptcy Rule 9014-1(b)(3))

In re:

EDWARD SEWON EHEE, et al.,

Debtors.

1 EDWARD SEWON EHEE ("Ehee"), moves as follows:

2 **RELIEF REQUESTED**

3 By this Motion Ehee, as debtor in *In re Ehee*, one of the above-referenced bankruptcy  
4 cases, requests entry of an order authorizing him to sell that certain real property commonly know  
5 as 6122 Acacia Ave., Oakland, California under 11 U.S.C. Sect. 363. The sale shall be made  
6 substantially in accordance with the "Residential Purchase Agreement and Joint Escrow  
7 Instructions" attached to the declartion of Edward Ehee filed contemporaneously herewith such  
8 extensions of closing deadlines as the parties may execute. The sale shall be subject to the  
9 following:  
10

- 11 1. The purchase price shall be \$1,345,000;
- 12 2. Closing shall occur within 14 days of the entry of the order approving the  
13 sale unless both parties agree to an extension of such deadline;
- 14 3. Normal and regular closing costs, all valid liens and encumbrances, and  
15 real estate commissions shall be paid from escrow;
- 16 4. Proceeds of the sale net of such costs, commissions, and liens shall paid  
17 into the registry of the Court;
- 18 5. Ehee shall comply with paragraph IV of the Preliminary Injunction issued  
19 by this Court on November 22, 2006; and
- 20 6. Ehee shall be authorized to modify the terms of the sale or sell to a  
21 different buyer so long as the terms of such sale are not less favorable to  
22 the seller than those set-forth above and Ehee otherwise complies with  
23 paragraph IV of the Preliminary Injunction with respect to any such  
24 proposed modification or alternative buyer.  
25  
26  
27  
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1           7.       The Court shall waive the 10 day stay of the order approving the sale to the  
2                       extent otherwise applicable under Fed.R.Bankr.P. 6004(g).

3           **WHEREFORE**, the Ehee requests that the Court enter an order authorizing the relief  
4 requested in this Motion

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6                                       Respectfully submitted,

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8                                       /s/ James D. Wood

9       DATED: September 13, 2007

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James D. Wood  
Attorney for EDWARD S. EHEE

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